



UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

No. 2:23-cr-00169-MEMF

Plaintiff,

I N F O R M A T I O N

v.

[18 U.S.C. § 1001(a)(2): Making
False Statements]

MICHAEL BARZMAN,

Defendant.

The United States Attorney charges:

[18 U.S.C. § 1001(a)(2)]

A. INTRODUCTORY ALLEGATIONS

At times relevant to this Information:

1. In approximately 2012, defendant MICHAEL BARZMAN and an associate, J.F., formed a plan to create drawings and paintings in the style of celebrated artist and painter, Jean-Michel Basquiat, and market the artworks for sale as if they were authentic works by the artist.

2. Defendant BARZMAN and J.F. worked together to create a series of paintings and drawings designed to imitate works by Basquiat ("the Fraudulent Paintings"). J.F. and defendant

1 BARZMAN created approximately 20-30 artworks by using various
2 art materials to create colorful images on cardboard.

3 3. Defendant BARZMAN then sold the Fraudulent Paintings
4 and gave a share of the profits to J.F.

5 B. FALSE STATEMENTS

6 4. Between on or about August 18, 2022, and on or about
7 October 13, 2022, in Los Angeles County, within the Central
8 District of California, in a matter within the jurisdiction of
9 the executive branch of the government of the United States,
10 specifically, the Federal Bureau of Investigation, defendant
11 BARZMAN knowingly and willfully made materially false,
12 fictitious, and fraudulent statements and representations to the
13 FBI for the purpose of influencing an FBI investigation in the
14 Central District of California, knowing that these statements
15 were untrue. Specifically:

16 a. When Special Agents asked whether someone painted
17 the Fraudulent Paintings for defendant BARZMAN, he responded
18 "no." When asked whether he painted them himself, defendant
19 BARZMAN responded "no." In fact, as defendant BARZMAN then
20 knew, he and his friend, J.F., made the Fraudulent Paintings.

21 b. When Special Agents showed defendant BARZMAN one
22 of the Fraudulent Paintings, which bore a shipping label with
23 his name on it, defendant BARZMAN told the Special Agents that
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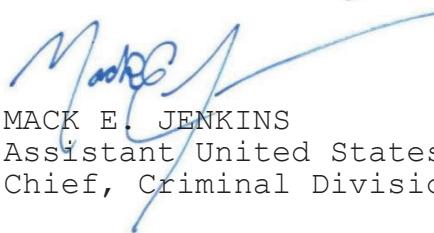
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1 he had never seen the work before. In fact, as defendant
2 BARZMAN then knew, he and/or his friend, J.F., made the work.

3 E. MARTIN ESTRADA
4 United States Attorney

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6 MACK E. JENKINS
7 Assistant United States Attorney
Chief, Criminal Division

8 MARK A. WILLIAMS
9 Assistant United States Attorney
Chief, Environmental and
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10 MATTHEW W. O'BRIEN
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